

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS,
GALVESTON DIVISION

CHANDRA JACKSON ON BEHALF OF §
MINOR CHILD JANE DOE, §
TATIAWNA JORDAN ON BEHALF OF §
MINOR CHILD JOHN DOE, §
Plaintiffs, §

v. §

CLEAR CREEK INDEPENDENT §
SCHOOL DISTRICT §
Defendant. §

C.A. No. 3:22-cv-00271

DEFENDANT CLEAR CREEK INDEPENDENT SCHOOL DISTRICT'S
NOTICE OF INTENT TO FILE RULE 12(b) MOTION TO DISMISS

Defendant Clear Creek Independent School District ("Clear Creek ISD") files this notice of intent to file a motion to dismiss under Rule 12(b). Pursuant to Judge Brown's procedures and Local Rule 6, Defendant Clear Creek ISD served counsel for the Plaintiffs with a letter today informing them of their right to amend the pleadings under the Judge's procedures. The letter specified that the amended pleading must be filed within 14 days of the date of the letter.

Respectfully submitted,

THOMPSON & HORTON LLP

By: /s/ Christopher B. Gilbert
Christopher B. Gilbert
State Bar No. 00787535
Southern District No. 17283
Attorney-in-Charge
Phoenix Tower, Suite 2000
3200 Southwest Freeway
Houston, Texas 77027
Telephone: (713) 554-6744
Fax: (713) 583-7698
cgilbert@thompsonhorton.com

ATTORNEY FOR DEFENDANT
CLEAR CREEK ISD

OF COUNSEL:

Ryan H. Newman
State Bar No. 24059944
Southern District No. 988075
THOMPSON & HORTON LLP
Phoenix Tower, Suite 2000
3200 Southwest Freeway
Houston, Texas 77027
Telephone: (713) 554-6767
rnewman@thompsonhorton.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading has been served on all counsel of record through the Court's electronic filing system, on September 21, 2022:

Mr. Todd E. Webb
The Law Office of Todd E. Webb
4101 Greenbriar Suite 122E
Houston, Texas 77098
Attorneys for the Plaintiffs

/s/ Christopher B. Gilbert
Christopher B. Gilbert